



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION
**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**
ONE SOUTH STATION

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June 27, 2005

VIA EMAIL AND USPS

Keefe B. Clemons
Assistant General Counsel
185 Franklin Street, 13th Floor
Boston MA 02110

RE: Complaint of DSCI Corporation for Declaratory Orders to Ensure
Verizon-Massachusetts Compliance with Resale Obligations with Respect to
Customer Specific Pricing Contracts, D.T.E. 05-28

Dear Attorney Clemons:

Enclosed please find the first set of information requests issued by the Department of Telecommunications and Energy in the above-captioned matter. In accordance with the procedural schedule, please submit Verizon's responses to the Department and the parties in hard copy and by email on or before 5:00 p.m., Wednesday, July 6, 2005. If you have any questions regarding the information requests, please contact me at 617-305-3561.

Sincerely,

/s/
Carol M. Pieper
Hearing Officer

Encs.

cc: D.T.E. 05-28 service list (w/encs.)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO VERIZON-MASSACHUSETTS, D.T.E. 05-28**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon-Massachusetts (“Verizon”) the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Verizon or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses as follows: (a) one original to Mary L. Cottrell, Secretary of the Department; (b) one copy to all parties; (c) two copies to Carol M. Pieper, Hearing Officer; and (d) one copy to each Department staff member listed on the current distribution list.

Requests

- DTE 1-1 Direct Testimony of Pamela McCann at page 2 states that “Nationally, there has been only one other CLEC that has requested CSP terms and conditions from a Verizon entity for purposes of resale.” State the requesting CLEC, when and where this request took place, and the ultimate outcome in that instance.
- DTE 1-2 Direct Testimony of Pamela McCann at page 5 states that DSCI executed a resale letter agreement for the COMA. State when this agreement was signed, and provide a copy of the letter agreement.
- DTE 1-3 State whether Verizon has provided to DSCI usage rates related to the executed letter agreement referred to in DTE 1-2 above. If Verizon has provided usage rates, state the date such rates were provided.